

EXHIBIT B

THOMAS W. BEVAN, ESQ. - 05/15/2018

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

KIMBERLEE WILLIAMS,

et al.,

PLAINTIFFS,

vs.

BASF CATALYSTS LLC,

et al.,

DEFENDANTS.

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CIVIL ACTION
NO. 11-CV-01754

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THE VIDEOTAPED DEPOSITION OF THOMAS W. BEVAN, ESQ.
TUESDAY, MAY 15, 2018

14 The videotaped deposition of THOMAS W. BEVAN,
15 ESQ., called by the Defendants for examination
16 pursuant to the Federal Rules of Civil Procedure,
17 taken before me, the undersigned, Sarah R. Drown,
18 Registered Professional Reporter and Notary Public
19 within and for the State of Ohio, taken at the
20 offices of Thompson Hine LLP, 3900 Key Center, 127
21 Public Square, Cleveland, Ohio, commencing at 9:03
22 a.m., the day and date above set forth.

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<p>1 identified, did you talk to anybody from Cohen, 2 Placitella & Roth regarding today's deposition? 3 A No. 4 Q Did you have any communications with Cohen, 5 Placitella & Roth regarding today's deposition? 6 A No. I said hi to them this morning. 7 Q Did you bring any documents with you today? 8 A Nothing related to this case. 9 Q Going back to 236. Or I'm sorry, 237, the 10 Bloomberg article. 11 A Yes. 12 Q Did you tell the reporter that you were 13 involved in the Williams case? 14 A I don't recall. 15 Q Okay. Or did you tell them you were involved 16 in a federal court case involving six people in 17 New Jersey that may or may not be Williams? 18 MR. ROTH: Objection. 19 A I don't recall. 20 Q All right. So could you just turn to the 21 second page of the Bloomberg printout. 22 It says, "'This has really opened a 23 Pandora's Box,' said Tom Bevan, a lawyer in 24 Boston Heights, Ohio, who represented hundreds 25 of people who sued Engelhard in the 1990s and</p>	<p>1 '15. 2 Q The quote "This has really opened a Pandora's 3 Box," is that an accurate quote? 4 A I think it is. 5 Q You said that to the reporter? 6 A I assume I said it. I don't recall saying it, 7 but I would agree with that statement. 8 Q And did you tell him you were involved in the 9 federal case? 10 A I don't recall. I know I -- I know I told them 11 I was representing Mrs. Holley, who's the 12 executrix of the Darnell estate. 13 Q How are you involved in the federal case? 14 A Well, I still represent thousands of people 15 that potentially are class members. I'm not 16 handling the federal case in any way. I'm not 17 counsel of record, but I am still the attorneys 18 for these -- for Mrs. Williams, for Marilyn 19 Holley, for the Ware family. I'm the attorney 20 for the Clark family. 21 Q But independent of your relationships with 22 Holley, Ware, and the other plaintiffs, you 23 have a fee agreement with Cohen, Placitella & 24 Roth, correct? 25 MR. ROTH: Objection.</p>
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<p>1 is involved in a current federal case against 2 BASF." 3 Do you see that? 4 A Yes. 5 Q Do you have any idea of what -- withdrawn. 6 When you read the article, did you have 7 any understanding of what the "current federal 8 case against BASF" referred to? 9 A I assume it's this class action but ... 10 Q Williams? 11 A Yeah. 12 Q Okay. And when you read that, you knew it had 13 to do with Williams, correct? 14 A You know, I don't know that I really gave it 15 much thought. 16 Q Are you involved in any other federal case 17 against BASF? 18 A I'm involved in the Ross case, and I don't 19 recall -- I know it's filed in New Jersey. 20 Whether that's a state court or federal court, 21 I'm not sure. 22 Q Was the Ross case even filed at this time? 23 A I don't know when the Ross case was filed. 24 That was probably filed in -- I don't know. 25 I'm not sure when the Ross case was -- '16 or</p>	<p>1 A Say that again. Independent of? 2 Q Independent of your relationships with the 3 named plaintiffs, you have a separate 4 relationship with Cohen, Placitella & Roth -- 5 MR. McDERMOTT: Objection. 6 Q -- correct? 7 A I have relationships, yes. 8 Q You have a fee arrangement with Cohen, 9 Placitella & Roth, correct? 10 MR. McDERMOTT: Objection. 11 MR. ROTH: Objection. 12 A Yes. 13 Q Has that been disclosed to your individual 14 clients? 15 MR. ROTH: Objection. 16 MR. McDERMOTT: Same objection. 17 MR. ROTH: Privilege. 18 MR. McDERMOTT: Continuing 19 objection about these questions. 20 A I'm -- I'm fairly certain that, for instance, 21 on the Ross case, I assume that the client 22 signed a fee agreement with both our firm on 23 there and the Placitella firm. 24 Q Regarding the Williams case, have you disclosed 25 your arrangements with Cohen, Placitella & Roth</p>

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<p style="text-align: right;">Page 114</p> <p>1 you did with the named plaintiffs? Fair?</p> <p>2 MR. ROTH: Objection to</p> <p>3 form.</p> <p>4 A Certainly from Mr. Placitella's end. You know,</p> <p>5 he knew more than, you know, my clients knew.</p> <p>6 Q You provided Mr. Placitella with more facts</p> <p>7 than you provided to your clients, fair?</p> <p>8 MR. ROTH: Objection.</p> <p>9 A I think so.</p> <p>10 Q Well, since you never spoke to Ms. Wengerd or</p> <p>11 Ms. Williams regarding the facts, by definition</p> <p>12 you had to provide Mr. Placitella with more</p> <p>13 facts, fair?</p> <p>14 MR. ROTH: Objection.</p> <p>15 A Me personally, yeah, sure.</p> <p>16 Q And in providing these facts, some of the facts</p> <p>17 were in emails, correct?</p> <p>18 A I think. I'm not positive, but I think.</p> <p>19 Q Have you reviewed these emails?</p> <p>20 A I -- no. I got a stack of emails, but I have</p> <p>21 not reviewed them.</p> <p>22 Q When did you get a stack of emails?</p> <p>23 A Some -- some time ago. I printed out a stack</p> <p>24 of my emails.</p> <p>25 Q A week, a month, two months?</p>	<p style="text-align: right;">Page 116</p> <p>1 didn't discuss with your clients, correct?</p> <p>2 MR. ROTH: Objection.</p> <p>3 A I don't know.</p> <p>4 Q You never discussed anything with Ms. Williams?</p> <p>5 A Me personally?</p> <p>6 Q Correct. Correct.</p> <p>7 A No.</p> <p>8 Q And she's the named plaintiff in this case,</p> <p>9 correct?</p> <p>10 A I think she's the lead plaintiff.</p> <p>11 MR. ROTH: Objection.</p> <p>12 Q So if there are any facts in those emails,</p> <p>13 Mr. Placitella would have greater access to</p> <p>14 those facts than Ms. Williams, true?</p> <p>15 A I can't answer that. I don't -- I don't know.</p> <p>16 Q Did you provide Mr. Placitella with facts</p> <p>17 regarding the underlying Engelhard cases?</p> <p>18 A Again, I'm not sure what I put in the email.</p> <p>19 Q Well, you said previously you did put facts in</p> <p>20 the --</p> <p>21 A I said I think I did, but I don't know exactly</p> <p>22 what I put in.</p> <p>23 Q And you wouldn't know until you or somebody</p> <p>24 reviewed them as to whether there are facts in</p> <p>25 those emails?</p>
<p style="text-align: right;">Page 115</p> <p>1 A I don't recall when it was.</p> <p>2 Q And did you review them in the context of this</p> <p>3 case?</p> <p>4 A I did not review them, I just printed them.</p> <p>5 Q Why did you print them?</p> <p>6 A In case I was going to have to turn them over.</p> <p>7 Q You weren't curious as to what were on the</p> <p>8 emails?</p> <p>9 A It's a lot of emails. I didn't have the time.</p> <p>10 I'm not going to review them if I don't have</p> <p>11 to.</p> <p>12 Q What do you mean "a lot"?</p> <p>13 A It's, you know, dozens of emails. I mean it's</p> <p>14 probably a four-inch, five-inch stack of</p> <p>15 emails.</p> <p>16 Q To and from Mr. Placitella and his colleagues?</p> <p>17 A Yes.</p> <p>18 Q And those emails, again, contain information</p> <p>19 that your clients don't have --</p> <p>20 MR. ROTH: Objection.</p> <p>21 Q -- correct, the five --</p> <p>22 MR. ROTH: Form and</p> <p>23 foundation.</p> <p>24 A I wouldn't agree with that.</p> <p>25 Q Well, those emails contain facts that you</p>	<p style="text-align: right;">Page 117</p> <p>1 A That's true.</p> <p>2 Q Okay. And would it -- would there be some</p> <p>3 reason why you wouldn't convey to</p> <p>4 Mr. Placitella facts in those emails?</p> <p>5 MR. ROTH: Objection.</p> <p>6 A Yeah, if it didn't come up. If there wasn't a</p> <p>7 need at the time.</p> <p>8 Q Well, in this four-inch stack of dozens and</p> <p>9 dozens of emails, can you think of any reason</p> <p>10 why you wouldn't convey to him a fact that</p> <p>11 would be relevant to the case?</p> <p>12 A If it didn't come up, I didn't put it in an</p> <p>13 email.</p> <p>14 Q Well, what type of communications would you</p> <p>15 have with Mr. Placitella if you weren't</p> <p>16 conveying to him facts regarding the underlying</p> <p>17 action?</p> <p>18 A Well, first of all, I've had communications</p> <p>19 with Mr. Placitella and people of his -- from</p> <p>20 his firm on things unrelated to this case.</p> <p>21 I've had conversations in email communications</p> <p>22 with them with respect to the Ross case. That</p> <p>23 would all be in that same stack of emails.</p> <p>24 Q So let's put the Ross case and other cases --</p> <p>25 let's just talk about the Williams case.</p>

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<p style="text-align: right;">Page 190</p> <p>1 suggestion.</p> <p>2 MR. ASSAF: No.</p> <p>3 MR. McDERMOTT: You ask such</p> <p>4 vague questions.</p> <p>5 MR. ASSAF: You have form</p> <p>6 or foundation.</p> <p>7 MR. McDERMOTT: All right.</p> <p>8 MR. ASSAF: Let's get the</p> <p>9 judge on again. We have form and foundation.</p> <p>10 That's it. You want --</p> <p>11 MR. ROTH: Okay. Well,</p> <p>12 now we're off the record, why don't --</p> <p>13 MR. ASSAF: No, let's go on</p> <p>14 the record.</p> <p>15 MR. ROTH: We're now out</p> <p>16 of the hearing of the witness.</p> <p>17 Mr. McDermott, can you explain to</p> <p>18 Mr. Assaf what your issue is, and maybe --</p> <p>19 MR. McDERMOTT: My issue</p> <p>20 is that --</p> <p>21 MR. ROTH: -- you can</p> <p>22 clarify the question.</p> <p>23 MR. McDERMOTT: My issue is</p> <p>24 this, is that it depends upon the disease to</p> <p>25 answer that question. Your question wasn't</p>	<p style="text-align: right;">Page 192</p> <p>1 MR. ASSAF: All right.</p> <p>2 - - - - -</p> <p>3 (Mr. Bevan now present.)</p> <p>4 - - - - -</p> <p>5 BY MR. ASSAF:</p> <p>6 Q By the way, Mr. Bevan, did you discuss your</p> <p>7 testimony during the prior breaks?</p> <p>8 A No.</p> <p>9 Q In terms of --</p> <p>10 MR. ROTH: There was only</p> <p>11 one break.</p> <p>12 Q In terms of -- yeah, the prior break.</p> <p>13 In terms of your settlement of asbestos</p> <p>14 talc cases, how long have you been doing that?</p> <p>15 A I think the first time I did a settlement with</p> <p>16 any talc defendant was in 1997 and I think the</p> <p>17 last time was probably in I want to say 2011</p> <p>18 maybe.</p> <p>19 Q Could you tell me roughly how many talc cases</p> <p>20 you've settled? Round numbers.</p> <p>21 MR. ROTH: Objection to</p> <p>22 form. Form and foundation.</p> <p>23 A Boy, I'm not sure. 1 to 2,000.</p> <p>24 Q And could you tell me how many -- on behalf of</p> <p>25 how many plaintiffs you've settled asbestos</p>
<p style="text-align: right;">Page 191</p> <p>1 clear. For me to interpose a correct</p> <p>2 objection, just tell me what disease you're</p> <p>3 talking about, that's all. That's all I --</p> <p>4 MR. ASSAF: Then make a</p> <p>5 form or foundation objection.</p> <p>6 MR. McDERMOTT: But you can't</p> <p>7 clear it up by form and foundation --</p> <p>8 MR. ASSAF: You're not</p> <p>9 litigating the case --</p> <p>10 MR. McDERMOTT: -- Mr. Assaf,</p> <p>11 because you've been asking vague and</p> <p>12 hypothetical questions all day.</p> <p>13 MR. ASSAF: It's not. He's</p> <p>14 one of the most experienced plaintiffs asbestos</p> <p>15 lawyers in the country. I think he understands</p> <p>16 my question.</p> <p>17 MR. McDERMOTT: I think I take</p> <p>18 issue with that.</p> <p>19 MR. ASSAF: All right.</p> <p>20 Let's bring him back in. Form or -- well,</p> <p>21 let's not.</p> <p>22 Anything except form or foundation, let's</p> <p>23 get the judge on the line.</p> <p>24 MR. McDERMOTT: Just continue</p> <p>25 the deposition.</p>	<p style="text-align: right;">Page 193</p> <p>1 cases apart from talc?</p> <p>2 A How many individual plaintiffs I have settled</p> <p>3 asbestos cases for. Probably I'm going to</p> <p>4 estimate 20 to 30,000.</p> <p>5 Q All right. Do you think you have a good</p> <p>6 understanding of strengths and weaknesses of</p> <p>7 matters when you're recommending settlements to</p> <p>8 your clients?</p> <p>9 A When I have all of the evidence.</p> <p>10 Q Let's take a break. Lunch.</p> <p>11 THE VIDEOGRAPHER: Off the record.</p> <p>12 The time is 12:49.</p> <p>13 - - - - -</p> <p>14 (Recess taken.)</p> <p>15 - - - - -</p> <p>16 THE VIDEOGRAPHER: We're back on</p> <p>17 the record. The time is 1:29.</p> <p>18 BY MR. ASSAF:</p> <p>19 Q Do you think that BASF spoliated documents?</p> <p>20 A My understanding is that they did.</p> <p>21 Q What's your understanding from?</p> <p>22 A My understanding is that Eastern Magnesia</p> <p>23 tested their talc in the 1970s, found that it</p> <p>24 contained asbestos, and destroyed any documents</p> <p>25 related to that.</p>

<p style="text-align: right;">Page 194</p> <p>1 Q What's your understanding from? What source?</p> <p>2 A From what I've heard from Mr. Placitella and</p> <p>3 what I've read in the complaint. I'm not sure</p> <p>4 if I've seen any documents to that extent, but</p> <p>5 that's what I've been told.</p> <p>6 Q Did Mr. Placitella talk to you about any state</p> <p>7 court proceedings regarding spoliation or</p> <p>8 crime-fraud?</p> <p>9 MR. ROTH: Objection.</p> <p>10 Form.</p> <p>11 Hold on for a second.</p> <p>12 That's a yes or no.</p> <p>13 A I don't recall what's in state court, what's in</p> <p>14 federal court.</p> <p>15 Q Did he tell you about any spoliation or</p> <p>16 crime-fraud hearings, period?</p> <p>17 A I assume there was one in this case, because I</p> <p>18 thought that was one of the issues that was up</p> <p>19 at the circuit court, but I don't recall.</p> <p>20 Q Has he talked to you about any -- withdrawn.</p> <p>21 Regarding the spoliation allegations,</p> <p>22 what do you understand the facts alleged are?</p> <p>23 A My understanding of the facts was what I just</p> <p>24 said and that sometime in the 1980s, they</p> <p>25 gathered up the documents and destroyed them.</p>	<p style="text-align: right;">Page 196</p> <p>1 better position to do that than I would.</p> <p>2 Q Well, you know the facts better than he does,</p> <p>3 in terms of the underlying cases, true?</p> <p>4 A Yes.</p> <p>5 Q And you're barred in Ohio? You're a member of</p> <p>6 the Bar?</p> <p>7 A Yeah, I'm a member of the Bar in Ohio.</p> <p>8 Q And you can associate with Mr. Placitella to</p> <p>9 bring a case here, correct?</p> <p>10 A Yeah. Yeah. Yeah, sure.</p> <p>11 Q Is there any impediment to doing so?</p> <p>12 A I don't know. I haven't researched it to</p> <p>13 determine if there's any impediment, but we</p> <p>14 chose to pursue it the way it's being pursued.</p> <p>15 Q Do you view yourself as kind of co-counsel in</p> <p>16 Williams?</p> <p>17 A If -- I guess it depends if -- for instance,</p> <p>18 take the Darnell case and if the Darnell case,</p> <p>19 if we're set back to square one and Darnell's</p> <p>20 able to pursue the -- her claim against Eastern</p> <p>21 Magnesia Talc with all of the relevant</p> <p>22 evidence, than I would assume that I would be</p> <p>23 co-counsel because I know a tremendous amount</p> <p>24 of the Darnell case.</p> <p>25 I wouldn't be able to do it by myself, I</p>
<p style="text-align: right;">Page 195</p> <p>1 Q And when did Mr. Placitella convey that to you</p> <p>2 in words or in substance?</p> <p>3 MR. ROTH: Objection to</p> <p>4 form and foundation.</p> <p>5 A It would have been 2010 or '11. I believe it</p> <p>6 was in the complaint as well.</p> <p>7 Q Other than that, have you had any conversations</p> <p>8 with Mr. Placitella regarding spoliation</p> <p>9 allegation?</p> <p>10 MR. McDERMOTT: Objection.</p> <p>11 A No.</p> <p>12 Q Have you initiated any efforts in Ohio to</p> <p>13 reopen any cases?</p> <p>14 A No.</p> <p>15 Q Why not?</p> <p>16 A Because that's being handled by the Placitella</p> <p>17 firm as part of the class action.</p> <p>18 Q Could you? Withdrawn.</p> <p>19 Do you have the capability and experience</p> <p>20 and resources to try to reopen individual cases</p> <p>21 here?</p> <p>22 A I certainly have the resources. You know, as</p> <p>23 far as the ability and experience, I think</p> <p>24 Mr. Placitella knows things that I don't know,</p> <p>25 and so I would think that he would be in a</p>	<p style="text-align: right;">Page 197</p> <p>1 would need the assistance of the Placitella</p> <p>2 firm because they know more about BASF and what</p> <p>3 BASF knew, when they knew it, what they did</p> <p>4 with the evidence, those things.</p> <p>5 Q Do you view yourself as having a co-counsel</p> <p>6 relationship with Mr. Placitella?</p> <p>7 A Certainly in the Ross case and certainly --</p> <p>8 yeah, if we get to that point that I described,</p> <p>9 then yes.</p> <p>10 Q At trial, would you be co-counsel?</p> <p>11 MR. ROTH: Trial of what</p> <p>12 case?</p> <p>13 A It depends on what issue's being tried.</p> <p>14 Q The Williams case.</p> <p>15 A It depends on what issue's being tried in the</p> <p>16 Williams case.</p> <p>17 Q Well, what issue can you imagine you would be</p> <p>18 co-counsel?</p> <p>19 MR. ROTH: Objection to</p> <p>20 form and foundation.</p> <p>21 A If, again, the Williams case was set back to</p> <p>22 square one and we were permitted to try our</p> <p>23 case, I'm familiar with the medical and the</p> <p>24 facts of the case. I would assume that I would</p> <p>25 have a role in that as co-counsel.</p>

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<p style="text-align: right;">Page 418</p> <p>1 Q Let me show you -- and again this may have been</p> <p>2 marked too and I apologize. It's Exhibit 131.</p> <p>3 A I don't think this one was.</p> <p>4 Q And this is a letter to you from Scott Martin</p> <p>5 dated July 24, 1996?</p> <p>6 A Yes.</p> <p>7 Q In the context of requesting the voluntary</p> <p>8 dismissal of the Strickland case, what is</p> <p>9 Mr. Martin telling you about whether Emtal has</p> <p>10 asbestos in it?</p> <p>11 A He indicated there is no evidence whatsoever</p> <p>12 that talc mined or milled by Emtal contained</p> <p>13 asbestos.</p> <p>14 Q I only mean to be a little bit glib, but do you</p> <p>15 need to be a scientist or do you need a</p> <p>16 scientist or did you need an expert in 1996 to</p> <p>17 decipher what Mr. Martin meant when he wrote to</p> <p>18 you that there is no evidence whatsoever that</p> <p>19 talc mined and milled by Emtal contained</p> <p>20 asbestos?</p> <p>21 A It's clear what he meant.</p> <p>22 Q I don't have any other questions. And I think</p> <p>23 we're done.</p> <p>24 MR. ASSAF: Whoa. Whoa.</p> <p>25 Whoa. I have a couple.</p>	<p style="text-align: right;">Page 420</p> <p>1 MR. McDERMOTT: Objection.</p> <p>2 MR. ROTH: Move to strike.</p> <p>3 Q Well, is that not true?</p> <p>4 A I think --</p> <p>5 MR. McDERMOTT: Objection.</p> <p>6 A And I'm not sure what you mean by that.</p> <p>7 Q You'd like to see the plaintiffs win this case?</p> <p>8 A The plaintiffs should win this case --</p> <p>9 MR. McDERMOTT: Objection.</p> <p>10 A -- yes. Absolutely.</p> <p>11 Q In terms of showing product ID, one of the ways</p> <p>12 you show it is from interrogatory responses</p> <p>13 from the defendant, correct?</p> <p>14 A Yes.</p> <p>15 Q Sales records from the defendants, correct?</p> <p>16 A Yes.</p> <p>17 Q The sales -- or I'm sorry. The purchasing</p> <p>18 records from facilities, for example,</p> <p>19 BFGoodrich purchasing records, correct?</p> <p>20 A If they exist, yes.</p> <p>21 Q And you also show it through your own client</p> <p>22 recollection by showing them pictures of</p> <p>23 various products to see if they could identify</p> <p>24 it --</p> <p>25 MR. ROTH: Asked and</p>
<p style="text-align: right;">Page 419</p> <p>1 MR. ROTH: You're at seven</p> <p>2 hours. What are you --</p> <p>3 MR. ASSAF: I don't think</p> <p>4 so.</p> <p>5 MR. ROTH: Well, what was</p> <p>6 the time before we went to plaintiffs' side?</p> <p>7 THE VIDEOGRAPHER: He was at 6:51.</p> <p>8 REEXAMINATION OF THOMAS W. BEVAN, ESQ.</p> <p>9 BY MR. ASSAF:</p> <p>10 Q Ready?</p> <p>11 A Sure.</p> <p>12 Q Mr. Roth asked you a bunch of questions about</p> <p>13 how to prove product ID based on all of your</p> <p>14 experience. Right?</p> <p>15 MR. ROTH: Objection.</p> <p>16 A He asked me a couple questions, sure.</p> <p>17 Q By the way, you never had any problems</p> <p>18 answering Mr. Roth's questions, did you?</p> <p>19 MR. McDERMOTT: Objection.</p> <p>20 A His questions were much more direct and simpler</p> <p>21 than your questions.</p> <p>22 MR. ROTH: Thank you very</p> <p>23 much.</p> <p>24 A They were better questions.</p> <p>25 Q You would like to see Mr. Roth win, correct?</p>	<p style="text-align: right;">Page 421</p> <p>1 answered.</p> <p>2 Q -- correct?</p> <p>3 A Sometimes we show them pictures. Usually not.</p> <p>4 Q And do you have any evidence -- withdrawn.</p> <p>5 Over the 15 years you were litigating</p> <p>6 with Emtal over product ID for its talc, did</p> <p>7 you ever feel as though you weren't getting the</p> <p>8 proper information from Emtal, in terms of</p> <p>9 their sales records?</p> <p>10 MR. McDERMOTT: Objection.</p> <p>11 A As I sit here today, I don't believe I did. I</p> <p>12 think they approached it that we had no</p> <p>13 asbestos in our talc so we're not giving you</p> <p>14 anything.</p> <p>15 Q Okay. So prior to talking to Mr. Placitella in</p> <p>16 2010, did you have any reason to believe that</p> <p>17 you weren't getting the sales information from</p> <p>18 Emtal that you were seeking?</p> <p>19 A Prior to --</p> <p>20 MR. ROTH: Objection.</p> <p>21 MR. McDERMOTT: Objection.</p> <p>22 A Prior to the conversation with Mr. Placitella,</p> <p>23 I had no reason to believe that Eastern</p> <p>24 Magnesia wasn't being forthright.</p> <p>25 Q And you got all the sales information you</p>